

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
PHIL NEUMAN,	:
Plaintiff,	:
	:
-against -	:
	:
GLOBAL SECURITY SOLUTIONS,	:
INC. and WERNER HELLMANN,	:
	:
Defendants.	:
-----X	

Case No.: 1:21-cv-01670-DLC

**NOTICE OF MOTION  
FOR RECONSIDERATION**

PLEASE TAKE NOTICE that Plaintiff Phil Neuman hereby moves pursuant to Rules 59(e) and 60(b) of the Federal Rules of Civil Procedure and Local Civil Rule 6.3 for reconsideration of that part of the Court's January 28, 2022 Order that denied Mr. Neuman's application to compel discovery of statements about Mr. Neuman made by Defendant Werner Hellman to persons other than Colin Conner.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Mr. Neuman submits a memorandum setting forth concisely the matters or controlling decisions which counsel believes the Court has overlooked.

Dated: January 28, 2022

THE GRIFFITH FIRM

/s/ Edward Griffith

By: \_\_\_\_\_  
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*Denied:  
Harris  
2/1/22*